

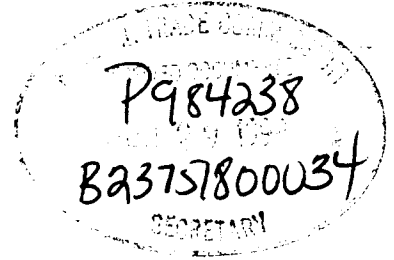


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Office of the Vice President  
Governmental Programs

1301 K Street, Northwest, Suite 1200  
Washington, DC 20005 3307

June 26, 1998



Mr. Donald S. Clark  
Secretary  
Federal Trade Commission  
Sixth Street and Pennsylvania Ave., N.W.  
Washington, D.C. 20580

Subject: Year 2000 Consumer Issues - - Comment, FTC File No. P984238

Dear Secretary Clark:

IBM is responding to the Federal Trade Commission's request for comments on the impact of the Year 2000 on consumer electronics products. In this segment, IBM primarily offers personal computer products, so our comments relate to that category of products. In an effort to respond quickly to the Commission's request, IBM's comments will be brief.

Personal computers, used by consumers as well as corporations, are comprised of products delivered by a range of suppliers through a broad variety of retail outlets. Taking a systems view of a "personal computer" would necessitate reviewing the total system set of issues from personal computer hardware, operating system software, applications provided by independent software vendors, peripheral device manufacturers as well as applications that end users may have written themselves. In recognition of the complexity associated with this issue, IBM has undertaken a number of initiatives to provide customers and consumers with relevant and timely information.

IBM has taken an aggressive stance to develop and publish an Internet web site as a source of helpful information regarding Year 2000 issues relating to IBM personal computers. We have a special section (<http://www.pc.ibm.com/year2000>) devoted to the personal computer issues including information on the problem in general; the Year 2000 ready status of all of our products; as well as links to many other information sources that can help consumers determine what action they may need to take. From this site, customers may also download, free of charge, changes to the system BIOS for many older IBM products, and other software and tools that can help them address the Year 2000 challenge.

We think the Internet is the best source for information for a topic as complex as this. However, we have also proactively tried to reach customers by providing information directly to some customers, by answering questions through our technical support centers, and sending information to our personal computer dealers to encourage and support their efforts in communicating to customers.

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Finally, IBM has been working with a number of outside organizations, such as the Small Business Administration and the Chamber of Commerce in support of broader outreach efforts to small business and the general public.

IBM appreciates having an opportunity to provide comments on the actions we have taken on this critical issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher G. Caine". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Christopher G. Caine

CGC:dbw